

EXHIBIT 7

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Attorneys for Defendants
RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC. a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANT RIMINI
STREET INC.'S SECOND
SET OF REQUESTS FOR
PRODUCTION OF
DOCUMENTS TO
PLAINTIFFS**

PROPOUNDING PARTY: Defendant Rimini Street, Inc.

RESPONDING PARTY: Plaintiffs Oracle USA, Inc., Oracle America, Inc., and
Oracle International Corporation

SET NO.: Two

**DEFENDANT RIMINI STREET INC.'S SECOND SET OF REQUESTS FOR
PRODUCTION TO PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 34, Defendant Rimini Street Inc. ("Rimini Street") requests that Plaintiffs Oracle USA, Inc. ("Oracle USA"), Oracle America, Inc. ("Oracle America"), and Oracle International Corporation ("OIC") (together "Oracle" or "Plaintiffs") produce for inspection and copying all of the following documents and other tangible things that are in its possession, custody, or control. Production shall take place within 30 days of service of this request, at the offices of Shook, Hardy & Bacon, LLP, 2555 Grand Boulevard, Kansas City, Missouri 64108 or at such other location and time as the parties may agree. Oracle is subject to a duty to supplement all responses to these requests for production in accordance with Federal Rule of Civil Procedure 26(e). The following definitions and instructions apply.

DEFINITIONS

The following definitions shall apply throughout these requests, regardless of whether upper or lower case letters are used:

A. The term "First Amended Complaint" refers to the "First Amended Complaint for Damages and Injunctive Relief" filed by Oracle on the April 19, 2010 in this action.

B. The term "document" is used herein in its broadest sense under Fed. R. Civ. P. 34 and applicable case law, including without limitation, hard copies, electronic documents, electronic or computerized data compilations, software, software images, or downloads.

1 E. If any document requested has existed, but has been lost, destroyed, or is no
2 longer within your possession, custody or control, identify those documents and describe the
3 document, its author(s), the recipients(s) or addressee(s), the subject matter and content. Further,
4 if the document has been destroyed, state with particularity the date and circumstances
5 surrounding the reasons for its destruction, and identify the last known custodian of the
6 document and each person who has knowledge of the loss or destruction of any such document.

8 F. With respect to any documents otherwise responsive to these requests that you
9 withhold or refuse to divulge on a claim of privilege or work product: (a) state the nature of the
10 claim of privilege and the holder of the privilege; and (b) furnish a description of all documents
11 withheld pursuant to the claim of privilege. If the claim of privilege applies to only a portion of
12 the document, produce all portions of the document to which the claim does not apply.

14 G. If subsequent to the date you produce documents responsive to these requests you
15 discover or receive documents that are responsive to any request herein, promptly produce all
16 such additional documents to the full extent required by the Federal Rules of Civil Procedure and
17 the Local Rules of the District Court.

18 H. Each document is to be produced along with all located drafts, without
19 abbreviation or redaction.

20 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

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23 **REQUEST NO. 1:** All documents relating to any communication between Oracle and the
24 Defendants.

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26 **REQUEST NO. 2:** All documents relating to any statement, communication, or
27 correspondence made, generated, or authorized by Oracle that refers or relates to the Defendants,
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1 the Defendants' products or services, or this lawsuit, including, without limitation, any speeches,
2 interviews, press releases, or publications made by Oracle to members of the media, analysts, an
3 Oracle customer, a potential Oracle customer, or a Rimini Street client.
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5 **REQUEST NO. 3:** All documents relating to Seth Ravin or Rimini Street, including, without
6 limitation, records, internal management reports, employment histories, personnel files, investor
7 reports, consultant reports, studies, prospectuses, correspondence, presentation outlines, reviews,
8 valuations, appraisals, audits, corporate minutes, Board of Director minutes and materials, and
9 market reports, including reports from distributors, agents, vendors, sales and marketing
10 personnel.
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13 **REQUEST NO. 4:** All documents relating to any analysis of the market for third party
14 software maintenance and support services for Oracle's PeopleSoft, J.D. Edwards, and Siebel
15 families of software products, including, without limitation, any Oracle analysis of the market for
16 maintenance and support services, the potential market for maintenance and support services, the
17 demand for such services, and any competitive analysis of past or existing third party support
18 vendors from January 1, 2004 to the present.
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21 **REQUEST NO. 5:** All documents relating to any opinion, analysis, comparison, study,
22 review, determination, assertion, notification, or conclusion (whether initial, final, preliminary,
23 or qualified) of Oracle's allegation that Defendants have infringed copyrights in Oracle software
24 applications and Software and Support Materials.
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1 **REQUEST NO. 60:** All documents relating to Oracle's contention that its "relationships have
2 been actually disrupted, causing certain current and prospective support customers to contract
3 with Defendants instead of with Oracle America and OIC for those customers' software support
4 and maintenance and, in some cases, for their enterprise software" as set forth in paragraphs 127
5 and 137 of your First Amended Complaint.
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8 **REQUEST NO. 61:** All documents relating to any current or former employee of Rimini Street
9 that has "prior employment experience with PeopleSoft, Siebel, or Oracle" as set forth in
10 paragraph 58 of your First Amended Complaint, including, without limitation, employment
11 histories and personnel files for each employee.
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13 **REQUEST NO. 62:** All documents relating to Oracle's knowledge of any statement,
14 communication, or correspondence made, generated, or authorized by Oracle that refers or
15 relates to the Defendants, the Defendants' products or services, or this lawsuit
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18 **REQUEST NO. 63:** All documents relating to communications to or from any former, current
19 or prospective customer of either Oracle or Defendants that refers or relates to Rimini Street's
20 products or services.
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22 **REQUEST NO. 64:** All documents relating to "Oracle's substantial investment in the
23 development of its software" as referenced in paragraph 27 of your First Amended Complaint.
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1 **REQUEST NO. 87:** All documents supporting any of Oracle's claims or defenses in this
2 action.

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4 **REQUEST NO. 88:** All documents relating to your retention, destruction, and preservation
5 policies and practices, including electronic document retention, destruction, and preservation
6 policies and practices for all categories of documents responsive to any of these requests.
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10 DATED: May 13, 2010

SHOOK, HARDY & BACON

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12 By: /s/ Robert H. Reckers
13 Robert H. Reckers, Esq.
14 Attorney for Defendants
Rimni Street, Inc. and Seth Ravin

CERTIFICATE OF SERVICE

I hereby certify that the foregoing First Set of Requests for Production to Plaintiff was served on the 13th day of May 2010, via email, as indicated below.

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